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8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 DOCTOR AARON BOMER, an Individual,

12 Plaintiff,

13 vs.

14 STATE OF NEVADA-DIVISION OF
15 PUBLIC AND BEHAVIORAL HEALTH
16 (SOUTHERN NEVADA ADULT
17 MENTAL HEALTH SERVICES), a
18 division of the State of Nevada, JOANNE
MALAY, an individual, JACKIE
ARELLANO, an individual, JENNIFER
SEXTON, an individual,

19 Defendants.
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CASE NO.: 2:20-cv-00182-JCM-BNW

**STIPULATION AND ORDER
EXTENDING TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS
AND ANTI-SLAPP**

(SECOND REQUEST)

21 The parties, by and through counsel of record, hereby stipulate and agree that Plaintiff
22 will be granted an extension until **May 22, 2020** to file and serve a response to Defendants'
23 Motion to Dismiss (ECF No. 12) and Defendants' Special Motion to Dismiss Plaintiff's
24 Amended Complaint (ECF No. 13).

25 On or about January 29, 2020, Plaintiff filed his Amended Complaint. On or about
26 March 20, 2020, Defendant filed two Motions to Dismiss. On or about April 24, 2020, HKM
27 Employment Attorneys LLP ("HKM") was substituted as counsel of record for Plaintiff in place
28

1 of Mullins & Trenchak, Attorneys at Law. Defendant graciously granted HKM Employment
2 Attorneys LLP an extension until May 15, 2020 to respond to the Motions to Dismiss.

3 Plaintiff's new counsel was too optimistic about the sufficiency of that extension
4 because the review of the file and of the claims has proven more protracted than originally
5 anticipated. Unfortunately, HKM has experienced more than anticipated delays associated with
6 Covid-19 and unexpected travel arrangements. More specifically, Dr. Jenny Foley had to travel
7 to California to be at the German Consulate, necessitating out of state travel.
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9 On or about May 15, 2020, the Parties agreed to extend the time for Plaintiff's response
10 to **May 22, 2020** and the time for Defendants' reply to **June 19, 2020**.

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1 This request for an extension is sought to accommodate plaintiff's counsel's office and
2 staff, who are currently working remotely due to the COVID-19 pandemic and were recently
3 retained in this matter. Thus, this request is made in good faith and not for the purpose of delay.

4 Dated: May 15, 2020.

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6 HKM EMPLOYMENT ATTORNEYS
7 LLP

NEVADA OFFICE OF THE
ATTORNEY GENERAL

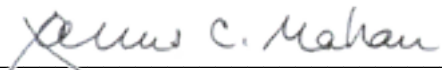
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9 By: /s/ Jenny L. Foley
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20 **ORDER**

21 IT IS SO ORDERED:

22 
23 UNITED STATES DISTRICT JUDGE

24 DATED: May 22, 2020
25 _____